



U.S. Department of Justice

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September 3, 2020

The Honorable George L. Russell, III
United States District Judge
United States Courthouse
101 W. Lombard Street
Baltimore, MD 21201

Re: *United States of America v. Steven Thomas*
Criminal Number GLR-17-540

Dear Judge Russell:

On July 13, 2020, the Defendant, Steven Thomas, entered a plea of guilty to Count One of the Indictment, Conspiracy to Provide Contraband to an Inmate in Prison, in violation of 18 U.S.C. § 371. He is scheduled for sentencing on September 8, 2020. The parties agreed to a sentencing range of 0-6 months pursuant to Fed. Rule of Crim. Pro. 11(c)(1)(C). I am writing to state the Government's sentencing recommendation, namely that a sentence in the lower range of the agreed upon range sentencing guidelines is appropriate in this case.

The PreSentence Report ("PSR") accurately reflects the total offense level, criminal history and guidelines in this matter. *See* PSR ¶¶ 24, 39, and 77, respectively. The Government does not have any corrections to the PSR, but suggests adding that on August 27, 2020, Judge Blake terminated supervised release and sentenced the Defendant to "time served" in CCB-16-0561. The basis of the violation in that matter is not the instant matter in front of this Court.

The Government believes the guidelines range in this matter is sufficient but not greater than necessary to achieve the goals of 18 U.S.C. § 3553(a). A sentence towards the lower range is appropriate given the Defendant's prior criminal history which does not include any crimes of violence. Moreover, a period of incarceration sends a message to the community that the Court takes smuggling illegal contraband into federal facilities seriously.

Finally, a sentence on the lower end of the range is consistent with the sentences issued for the co-defendants. The Court sentenced the most culpable defendant, who had a criminal history category VI, to 12 months' incarceration. The Court sentenced the least culpable defendant, who had a criminal history category I, to a suspended sentence and supervised release.

I thank the Court for its consideration of this matter.

Very truly yours,

Robert K. Hur
United States Attorney

By:_____/s/_____
Patricia McLane
Assistant United States Attorney

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